

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

_____)	
UNITED STATES OF AMERICA,)	
)	
v.)	
)	
ARTHUR GIANELLI,)	Criminal No. 05-10003-NMG
DENNIS ALBERTELLI,)	
FRANK IACABONI, and)	
DEEB HOMSI,)	
)	
Defendants.)	
_____)	

JOINT MEMORANDUM

The parties in the above-entitled action submit this Joint Memorandum pursuant to Rule 116.5 and this Court's Initial Scheduling Order. The Parties do not believe an initial status conference is necessary. Automatic discovery was delivered by the government on January 31, 2005. The discovery was voluminous and included 2282 pages of wiretap and search related affidavits, applications, and orders. Also included were two CDs of intercepted conversations, along with transcripts completed to date. The discovery included a CD of photographs and a videotape.

As a result, the defendants seek an additional 30 days, until March 18, 2005, to prepare discovery letters. The parties request a status conference at about that time to address issues that arise after the review of this material, as well as further scheduling issues. The parties agree that the period from January 7, 2005, through the March status conference is excludable under the Speedy Trial Act. Finally, a trial is anticipated, but it is impossible to predict its length at this time.

UNITED STATES OF AMERICA,
By its attorney,

/s/ Fred M. Wyshak
Fred M. Wyshak, Jr.
Assistant U.S. Attorney
1 Courthouse Way
Suite 9200
Boston, Massachusetts 02210
(617) 748-3100

ARTHUR GIANELLI,
By his attorney,

/s/ Richard M. Egbert
Richard M. Egbert
B.B.O. #151800
99 Summer Street
Suite 1800
Boston, Massachusetts 02110
(617) 737-8222

DENNIS ALBERTELLI,
By his attorney,

/s/ Charles W. Rankin
Charles W. Rankin
B.B.O #411780
Rankin & Sultan
1 Commercial Wharf North
Boston, Massachusetts 02110
(617) 720-0011

FRANK IACABONI,
By his attorney,

/s/ Thomas J. Butters
Thomas J. Butters
B.B.O. #068260
Butters Brazilian LLP
One Exeter Plaza
Boston, Massachusetts 02116
(617) 367-2600

DEEB HOMSI,
By his attorney,

/s/ Roger A. Cox
Roger A. Cox
B.B.O. #551514
Cox & Cox
30 Main Street
Suite 9
Ashland, Massachusetts 01721
(508) 231-1460

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